

1 JASON M. FRIERSON  
2 United States Attorney  
3 Nevada Bar Number 7709  
4 JEAN N. RIPLEY  
5 Assistant United States Attorney  
United States Attorney's Office  
501 South Las Vegas Blvd., Suite 1100  
Las Vegas, Nevada 89101  
Tel.: 702-388-6336  
Jean.Ripley@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:23-cr-00195-CDS-BNW

**Plaintiff,**

## **Stipulation to Continue Suppression Hearing**

V.

**(Fifth Stipulation to Continue)**

LEONARD JAMES SHOVE,

Defendant.

Plaintiff United States of America, by and through its counsel, Jason M. Frierson, United States Attorney, and Jean N. Ripley, Assistant United States Attorney, and defendant Leonard James Shove, by and through his counsel, Rene L. Valladares, Federal Public Defender, and Aden Kahssai, Assistant Federal Public Defender, hereby stipulate and agree to continue the suppression hearing currently scheduled for September 3, 2024, at 9:00 a.m., until September 23, 2024, or September 26, 2024, at a time to be determined by the Court.

The parties enter this stipulation for the following reasons:

1. All negotiations have ceased and the parties intend to proceed toward resolution of the pending Motion to Suppress (the “Motion”) (ECF No. 20), including the evidentiary hearing ordered by this Court (ECF No. 21).

2. The government anticipates the need to present approximately three to four witnesses at the evidentiary hearing. Two of those witnesses have represented that they were unavailable on September 3, 2024. Both witnesses are necessary to the evidentiary hearing.

3. The parties have confirmed with the assigned courtroom administrator that the Court is available on September 23 and September 26, 2024.

4. Trial in this matter is currently scheduled on December 16, 2024. The parties do not anticipate that the continuance sought herein will cause a delay in the trial date, and will seek further continuances of the pending trial date if necessary to resolve the issues raised in the Motion or other issues raised in this matter.

5. The continuance is not sought for purposes of delay, but only to ensure efficient adjudication of the issues raised in the Motion and use of judicial resources.

6. The defendant is in custody and agrees to the continuance.

Respectfully submitted this 16th day of August, 2024.

RENE VALLADARES

JASON M. FRIERSON

Federal Public Defender

## United States Attorney

/s/ Aden Kahssai

ADEN KAHSSAI

REBECCA LEVY

**REBECCA LEVI**  
Assistant Federal Public Defender

/s/ Jean N. Ripley

JEANN RIPLEY

Counsel for Defendant Shove

*Counsel for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA.

Case No. 2:23-cr-00195-CDS-BNW

Plaintiff,

## **Order to Continue Suppression Hearing**

V.

LEONARD JAMES SHOVE,

**Defendant.**

Based on the stipulation of counsel, the Court finds that good cause exists to modify the date of the suppression hearing currently scheduled for September 3, 2024.

IT IS FURTHER ORDERED that the suppression hearing currently scheduled for September 3, 2024, at 9:00 a.m., is continued until September 26, 2024 at 9:00 a.m. in Courtroom 3B.

DATED: August 20, 2024

Brenda Weksler  
HONORABLE BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE